

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

LISA RICCOBENE)	
Plaintiff)	
)	
v.)	C.A. No. 04-10256-MEL
)	
MASSACHUSETTS BAY)	
TRANSPORTATION AUTHORITY)	
And)	
ANNE McCALL)	
Defendants)	
)	

JOINT MOTION TO EXTEND PRETRIAL SCHEDULE BY NINETYDAYS

The parties to this action, through counsel, hereby respectfully request that the Court extend the pretrial schedule in this case by ninety days.

Specifically, it is requested that the pretrial schedule be extended as follows:

1. Close of fact discovery-extended from November 13, 2006 through February 11, 2007.
2. Date for filing of summary judgment motions-extended from January 10, 2007 through April 6, 2007.
3. Date for filing opposition to summary judgment motions-extended from February 9, 2007 through May 6, 2007.

As grounds for this motion, the parties state that they are currently involved in discovery in this action, but that additional time is needed to finish discovery.

For all of the foregoing reasons, it is respectfully requested that this motion be granted, and the pretrial schedule in this case extended as set forth above.

Lisa Riccobene
By her attorney

/s/Mitchell J. Notis

Mitchell J. Notis
Law Office of Mitchell J. Notis
370 Washington Street
Brookline, MA 02445
617-566-2700
BBO# 374360

Massachusetts Bay Transportation Authority
Anne McCall
By their attorneys,

/s/Joseph L. Edwards, Jr.

Walter B. Prince (BBO#406640)
Joseph L. Edwards, Jr. (BBO#564288)
Prince, Lobel, Glovsky & Tye LLP
585 Commercial Street
Boston, MA 02109
617-456-8000

CERTIFICATE OF SERVICE

I, Mitchell J. Notis, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and that paper copies will be sent to any non-registered participants as indicated in the Notice of Electronic Filing, this 9th day of November, 2006.

/s/Mitchell J. Notis

MITCHELL J. NOTIS, BBO# 374360
Law Office of Mitchell J. Notis
370 Washington Street
Brookline, MA 02445
Tel: 617-566-2700

